

**THE UNITED STATES DISTRICT COURT
FOR THE EASTERN DISTRICT OF VIRGINIA
RICHMOND DIVISION**

BLACK WATER MANAGEMENT, LLC,

Plaintiff,

CIVIL ACTION NO. 3:15cv365

v.

MOTION TO DISMISS

MARK D. SPRENKLE, et al.

Defendants.

COME NOW Defendants TBT Network, LLC, d/b/a Tim Be Told, Timothy Ouyang, Luan Nguyen, Jacob James “Jim” Barredo and Andrew Daniel Chae, (hereinafter collectively as “Defendants”), by counsel, and file this Motion to Dismiss, pursuant to Rules 12(b)(1) and 12(b)(6) of the Federal Rules of Civil Procedure, Plaintiff Black Water Management, LLC’s Complaint for failure to state a claim upon which relief may be granted. For the reasons and authority set forth in greater detail in the accompanying Memorandum of Law in Support of Defendants’ Motion to Dismiss, Defendants respectfully request this Court grant the Motion to Dismiss, dismiss all of Plaintiff’s claims with prejudice and such further relief deemed necessary and just.

Respectfully submitted this 31st day of August, 2015.

TBT NETWORK, LLC
TIMOTHY OUYANG
LUAN NGUYEN
JACOB JAMES “JIM” BARREDO
ANDREW CHAE

By _____ /s/_____
Of Counsel

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CERTIFICATE OF SERVICE

I hereby certify that on the 31st day of August 2015, I electronically filed the foregoing with the Clerk of Court using the CM/ECF system, which will send notification to the following:

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